

In the Matter of)
)
Digital Audio Broadcasting Systems) MM Docket No.99-325
And Their Impact On The Terrestrial)
Radio Broadcast Service)

Susquehanna has been a strong supporter of the In-Band/On-Channel (IBOC) concept since the idea was first conceived and Susquehanna personnel participated in the development of the NRSC standard that is the subject of this Public Notice. Susquehanna's belief in the future of IBOC is supported by its implementation of the iBiquity HD Radio system. Susquehanna is presently operating with iBiquity HD Radio on 13 of its 18 FM stations and

the remainder of these stations will be operational before the end of the year. Susquehanna is presently in the process of evaluating its AM broadcasting facilities for possible digital operation in the coming year.

The NRSC standard (NRSC 5) is a result of intense collaboration between industry engineering leaders and iBiquity Digital Corporation to develop an IBOC standard that allows for a smooth transition of the existing AM and FM broadcasting systems into the digital age. This standard is designed to insure that systems which comply with this standard will be interoperable and it provides the flexibility necessary to support services and applications that will be developed in the future.

Today, broadcasters are operating with multi-casting and surround sound broadcasting on an experimental basis and the transition to digital broadcasting using IBOC technology is still in its infancy. The flexibility of the HD Radio system and its ability to offer various bit rates, multi-casting, and a variety of ancillary data services is key to providing rapid acceptance by broadcasters, receiver manufacturers, and the listening public.

Susquehanna urges the commission to develop rules that will insure compliance with the NRSC standard. Of equal importance, the commission's rules should be flexible enough to not inhibit the innovation that will be necessary in order to provide improved and additional services that are sure to be developed in the future.

Susquehanna recognizes the concern of many broadcasters who fear the additional interference that AM IBOC may cause to nighttime reception, particularly on 1st adjacent channels, but we believe that this potential interference is minimal when compared to the quality and durability improvements that will occur in every station's main listening and marketing

area, for both day and night operation.

It is very important that AM broadcasting not be left behind in this transition to digital broadcasting and Susquehanna recognizes that no broadcast service is optimum when authorized as a daytime only service. In order to minimize the effect of potential 1st adjacent channel interference at night, Susquehanna supports the position taken by the National Association of Broadcasters in their March 5, 2004 letter to the commission stating:

NAB encourages the commission to authorize AM broadcasters to commence nighttime IBOC broadcasts with appropriate interference resolution mechanism. NAB further encourages the commission to extend this authorization to all AM broadcasters licensed for nighttime services without the need for individual station authorizations.

In summary, Susquehanna supports the development of commission rules to both insure operation in accordance with NRSC 5 and provide the flexibility for development of future services and applications. We look forward to the time when our “interim operation authority” will be replaced with permanent IBOC licenses.

Respectfully Submitted,

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